



Amanda E. Potter
Assistant Vice President-
Senior Legal Counsel

AT&T Services, Inc.
1120 20th Street, NW
Suite 1000
Washington, DC 20036

Phone: 202.457.2103
E-mail: amanda.potter@att.com

June 26, 2019

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: *Amendment to the Commission's Rules Concerning Market Modification;
Implementation of Section 102 of the STELA Reauthorization Act of 2014 –
MB Docket No. 15-71***

Dear Ms. Dortch:

Enclosed please find the *revised* results of DIRECTV's preliminary evaluation of its spot beam coverage for stations WBRC, WVTM, WABM-DT, and WIAT, each located in the Birmingham, AL DMA, for purposes of carriage in Randolph County, Alabama. As detailed in the enclosure, DIRECTV's planned retirement of a standard-definition satellite later this year necessitates a revision to DIRECTV's engineering certifications regarding the geographic spot beam coverage for the broadcast stations that were the subject of Randolph County's request for a preliminary evaluation. As the enclosure indicates, DIRECTV has shared these revised results with Randolph County.

Please contact me should you have any questions.

Respectfully submitted,

/s/ Amanda E. Potter

Amanda E. Potter

Enclosure



Via FedEx and Fax

June 26, 2019

Derek Farr
Chairman
Randolph County Commission
146 Vaughn Street
Roanoke, AL 36274
Fax: 256-357-2365

Dear Chairman Farr:

Please find attached updated results of your request for a preliminary evaluation of a potential market modification for **Randolph County, AL**.

Randolph County requested a preliminary evaluation for a possible market modification on September 8, 2017 involving WBRC (FOX), WVTM (NBC), WABM2 (ABC), and WIAT (CBS), all of which currently are assigned to the Birmingham, AL designated market area. On October 30, 2017, DIRECTV responded by submitting its preliminary evaluation results.

Based on plans to replace an SD satellite later this summer, our engineers have updated their evaluation of DIRECTV's spot beam coverage of Randolph County. DIRECTV's engineering staff concluded that five zip codes (36263, 36274, 36276, 36278, 36280) will not be covered by our SD spot beam when the planned replacement of the SD satellite occurs. Accordingly, DIRECTV's revised preliminary evaluation results are as follows:

- DIRECTV's SD spot beam will cover **4** zip codes in **Randolph County**
- DIRECTV's HD spot beam covers **ALL** zip codes in **Randolph County**

Additionally, please note that the Communications Act and the FCC's rules limit market modifications to commercial broadcast stations. Because WBIQ is a non-commercial station, the station is not eligible for a market modification. See 47 U.S.C. § 338(l). As a result, WBIQ was not re-evaluated.

DIRECTV does not take the position that carriage of the four commercial broadcast stations in Randolph County is technically or economically infeasible in these unique circumstances. However, in the event DIRECTV were to carry the Birmingham, AL stations in Randolph County, customers with SD equipment in the five zip codes identified above would need to obtain HD equipment in order to receive them.

Under these circumstances, HD equipment is made available at no additional charge for customers who require an upgrade to receive local channels in a modified market.¹

DIRECTV will forward the results of this updated feasibility determination to the FCC for its records.

Thank you for your letter and your interest in DIRECTV programming.

Sincerely,

DIRECTV

¹ Other terms and conditions associated with the equipment offer are disclosed to customers at the time of the upgrade.

Form of Certification Regarding Spot Beam Coverage

1. My name is Constance Goshgarian. I am VP - Architecture Engineering at DIRECTV. As such, I am responsible for determining service areas for television stations carried on DIRECTV's spot beams.

2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County
WABM-DT	AL	RANDOLPH

3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:

- The measured performance of the spot beam covering this Television Station's local market.
- Estimated atmospheric effects for reception of the signal.
- Estimated levels of interference.
- The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
- The target availability figure used for all television stations offered on the spot beam.

4. From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question:

- Signal availability.
- Clear sky signal margin.
- Total carrier-to- interference ratio.

5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.

6. Based on this analysis, DIRECTV:

- ☒HD ☐SD Can provide service to all the zip codes associated with this request.*
- ☐HD ☐SD Cannot provide service to any zip code associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.
- ☐HD ☒SD Cannot provide service to some zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.* The list of unserved zip codes is attached.

*** IMPORTANT: SD coverage will no longer be available after 2018/2019 when the existing MPEG 2 satellite is removed from service.**

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 05/03/2019

Date



Signature

Form of Certification Regarding Spot Beam Coverage

1. My name is Constance Goshgarian. I am VP - Architecture Engineering at DIRECTV. As such, I am responsible for determining service areas for television stations carried on DIRECTV's spot beams.

2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County
WBRC	AL	RANDOLPH

3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:

- The measured performance of the spot beam covering this Television Station's local market.
- Estimated atmospheric effects for reception of the signal.
- Estimated levels of interference.
- The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
- The target availability figure used for all television stations offered on the spot beam.

4. From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question:

- Signal availability.
- Clear sky signal margin.
- Total carrier-to- interference ratio.

5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.

6. Based on this analysis, DIRECTV:

- ☒HD ☐SD Can provide service to all the zip codes associated with this request.*
- ☐HD ☐SD Cannot provide service to any zip code associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.
- ☐HD ☒SD Cannot provide service to some zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.* The list of unserved zip codes is attached.

*** IMPORTANT: SD coverage will no longer be available after 2018/2019 when the existing MPEG 2 satellite is removed from service.**

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 05/03/2019

Date



Signature

Form of Certification Regarding Spot Beam Coverage

1. My name is Constance Goshgarian. I am VP - Architecture Engineering at DIRECTV. As such, I am responsible for determining service areas for television stations carried on DIRECTV's spot beams.
2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County
WIAT	AL	RANDOLPH

3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:
- The measured performance of the spot beam covering this Television Station's local market.
 - Estimated atmospheric effects for reception of the signal.
 - Estimated levels of interference.
 - The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
 - The target availability figure used for all television stations offered on the spot beam.
4. From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question:
- Signal availability.
 - Clear sky signal margin.
 - Total carrier-to- interference ratio.
5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.
6. Based on this analysis, DIRECTV:
- ☒HD ☐SD Can provide service to all the zip codes associated with this request.*
- ☐HD ☐SD Cannot provide service to any zip code associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.
- ☐HD ☒SD Cannot provide service to some zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.* The list of unserved zip codes is attached.

*** IMPORTANT: SD coverage will no longer be available after 2018/2019 when the existing MPEG 2 satellite is removed from service.**

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 05/03/2019

Date



Signature

Form of Certification Regarding Spot Beam Coverage

1. My name is Constance Goshgarian. I am VP - Architecture Engineering at DIRECTV. As such, I am responsible for determining service areas for television stations carried on DIRECTV's spot beams.
2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County
WVTM	AL	RANDOLPH

3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:
- The measured performance of the spot beam covering this Television Station's local market.
 - Estimated atmospheric effects for reception of the signal.
 - Estimated levels of interference.
 - The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
 - The target availability figure used for all television stations offered on the spot beam.
4. From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question:
- Signal availability.
 - Clear sky signal margin.
 - Total carrier-to- interference ratio.
5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.
6. Based on this analysis, DIRECTV:
- ☒HD ☐SD Can provide service to all the zip codes associated with this request.*
- ☐HD ☐SD Cannot provide service to any zip code associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.
- ☐HD ☒SD Cannot provide service to some zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.* The list of unserved zip codes is attached.

*** IMPORTANT: SD coverage will no longer be available after 2018/2019 when the existing MPEG 2 satellite is removed from service.**

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 05/03/2019

Date



Signature

Station	Zip	USPSFIPS	State	County	Covered_SD	Covered_HD	Evaluation Completed
WABM-DT	36255	01111	AL	RANDOLPH	YES	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WABM-DT	36258	01111	AL	RANDOLPH	YES	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WABM-DT	36263	01111	AL	RANDOLPH	NO	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WABM-DT	36264	01111	AL	RANDOLPH	YES	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WABM-DT	36266	01111	AL	RANDOLPH	YES	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WABM-DT	36270	01111	AL	RANDOLPH	could not find in either zip code database		SD: Updated 5/1/2019 HD: 10/26/2017
WABM-DT	36274	01111	AL	RANDOLPH	NO	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WABM-DT	36276	01111	AL	RANDOLPH	NO	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WABM-DT	36278	01111	AL	RANDOLPH	NO	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WABM-DT	36280	01111	AL	RANDOLPH	NO	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WBRC	36255	01111	AL	RANDOLPH	YES	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WBRC	36258	01111	AL	RANDOLPH	YES	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WBRC	36263	01111	AL	RANDOLPH	NO	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WBRC	36264	01111	AL	RANDOLPH	YES	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WBRC	36266	01111	AL	RANDOLPH	YES	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WBRC	36270	01111	AL	RANDOLPH	could not find in either zip code database		SD: Updated 5/1/2019 HD: 10/26/2017
WBRC	36274	01111	AL	RANDOLPH	NO	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WBRC	36276	01111	AL	RANDOLPH	NO	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WBRC	36278	01111	AL	RANDOLPH	NO	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WBRC	36280	01111	AL	RANDOLPH	NO	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WIAT	36255	01111	AL	RANDOLPH	YES	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WIAT	36258	01111	AL	RANDOLPH	YES	YES	SD: Updated 5/1/2019 HD: 10/26/2017

WIAT	36263	01111	AL	RANDOLPH	NO	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WIAT	36264	01111	AL	RANDOLPH	YES	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WIAT	36266	01111	AL	RANDOLPH	YES	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WIAT	36270	01111	AL	RANDOLPH	could not find in either zip code database		SD: Updated 5/1/2019 HD: 10/26/2017
WIAT	36274	01111	AL	RANDOLPH	NO	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WIAT	36276	01111	AL	RANDOLPH	NO	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WIAT	36278	01111	AL	RANDOLPH	NO	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WIAT	36280	01111	AL	RANDOLPH	NO	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WVTM	36255	01111	AL	RANDOLPH	YES	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WVTM	36258	01111	AL	RANDOLPH	YES	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WVTM	36263	01111	AL	RANDOLPH	NO	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WVTM	36264	01111	AL	RANDOLPH	YES	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WVTM	36266	01111	AL	RANDOLPH	YES	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WVTM	36270	01111	AL	RANDOLPH	could not find in either zip code database		SD: Updated 5/1/2019 HD: 10/26/2017
WVTM	36274	01111	AL	RANDOLPH	NO	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WVTM	36276	01111	AL	RANDOLPH	NO	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WVTM	36278	01111	AL	RANDOLPH	NO	YES	SD: Updated 5/1/2019 HD: 10/26/2017
WVTM	36280	01111	AL	RANDOLPH	NO	YES	SD: Updated 5/1/2019 HD: 10/26/2017